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UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

:

Genevieve A. Lamar : Case No.: 16-12291(ELF)

:

Debtor : Chapter 13

MOTION TO RECONSIDER THE MAY 13, 2020 ORDER DISMISSING THE CHAPTER 13 CASE

Comes Now, Genevieve A. Lamar, hereinafter referred to as "Debtor" and move this Honorable Court to vacate its May 13, 2020 Order Dismissing the instant matter and in support thereof aver the following:

- 1. The above captioned bankruptcy matter was filed as a Chapter 13 on or about April 1, 2016.
 - 2. The Chapter 13 bankruptcy matter was assigned case number 16-12291.
- 3. The Chapter 13 Plan was confirmed by this Honorable Court on September 29, 2016.
- 4. On or about September 5, 2019 the Chapter 13 Trustee filed a Motion to Dismiss the instant matter for failure to make timely and regular Chapter 13 payments.
- 5. In furtherance of the Trustee's Motion the instant matter was dismissed on May 13, 2020.
- 6. The Debtor made regular payments, unfortunately she was not aware of any delinquency and believed that she was current.
- 7. The Debtor is desirous of continuing to make regular and monthly Chapter 13 Plan payments and will cure all sums due and owing to the trustee by or before the date of the hearing on this subject Motion.

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WHEREFORE, for the reasons stated herein, the Debtor respectfully requests that this Honorable Court Reconsider its May 13, 2020 Order dismissing the instant matter.

Respectfully submitted,

Dated: June 5, 2020

/s/ Brad J. Sadek, Esquire Brad J. Sadek, Esquire Sadek and Cooper 1315 Walnut Street Suite 502 Philadelphia, PA 19107